

KTBS LAW LLP
1801 CENTURY PARK EAST, TWENTY-SIXTH FLOOR
LOS ANGELES, CALIFORNIA 90067
TELEPHONE: 310-407-4000

1 David M. Stern (CA Bar No. 67697)
dstern@ktbslaw.com
2 Thomas E. Patterson (CA Bar No. 130723)
tpatterson@ktbslaw.com
3 Samuel M. Kidder (CA Bar No. 284015)
skidder@ktbslaw.com
4 KTBS LAW LLP
1801 Century Park East, 26th Floor
5 Los Angeles, California 90067
Telephone: (310) 407-4065
6 Facsimile: (310) 407-9090

7 *Attorneys for Defendants MPT of*
Los Angeles, L.P., MPT of Olympia, LLC,
8 *MPT Operating Partnership, L.P., and*
Medical Properties Trust, Inc.
9

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 v.

15 OLYMPIA HEALTH CARE LLC,
16 ALECTO HEALTHCARE SERVICES,
LLC, MPT OF LOS ANGELES, L.P.,
17 MPT OF OLYMPIA, LLC, MPT
OPERATING PARTNERSHIP, L.P.,
18 MEDICAL PROPERTIES TRUST,
INC., SHERMAN/GRAYSON
HOSPITAL, LLC, ALECTO
19 HEALTHCARE SERVICES
SHERMAN, LLC, LAXMAN REDDY,
20 MATTHEW WILLIAMS, and
JEREMY REDIN,
21

22 Defendants.
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Case No. 2:23-cv-01783-ODW-PVC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served (Waiver of Service
Executed): March 13, 2023
Current Response Date: May 12, 2023
New Response Date: June 9, 2023

1 Plaintiff United States of America (“Plaintiff”) and Defendants MPT of Los
2 Angeles, L.P., MPT of Olympia, LLC, MPT Operating Partnership, L.P., and
3 Medical Properties Trust, Inc. (the “MPT Defendants” and, together with the
4 Plaintiff, the “Parties”) by and through their undersigned counsel, hereby stipulate
5 and agree as follows:

6 WHEREAS, Plaintiff filed the Complaint [Docket No. 1] (“Complaint”) on
7 March 9, 2023 and sent the Complaint to the MPT Defendants with a Notice of
8 Lawsuit and Request for Waiver of Service of Summons on March 13, 2023;

9 WHEREAS, the MPT Defendants returned an executed Waiver of Service of
10 Summons on March 13, 2023, which was filed with the Court on May 5, 2023
11 [Docket No. 14];

12 WHEREAS, based on the MPT Defendants’ waivers of service, the MPT
13 Defendants’ initial responsive pleading deadline is currently May 12, 2023;

14 WHEREAS, Rule 8-3 of the Local Civil Rules permits the Parties to stipulate
15 in writing, without a Court order, to extend the time to answer or otherwise respond
16 to the Complaint by not more than thirty (30) days;

17 WHEREAS, the Parties held a meet and confer call on May 4, 2023,
18 regarding the MPT Defendants’ intent to file a motion to dismiss the Complaint as
19 against them pursuant to Fed. R. Civ. P. 12(b)(6);

20 WHEREAS, having met and conferred, the Parties believe good cause exists
21 for this extension because the Parties require additional time to further meet and
22 confer regarding a potential resolution of the MPT Defendants’ motion to dismiss;

23 WHEREAS, this stipulation is made in good faith and not for the purpose of
24 delay or for any other improper purpose; and

25 WHEREAS, no discovery cut-off date, pretrial conference date, or trial date
26 has been set, and there have been no prior requests for extensions.

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED
2 between the Parties, by and through their counsel of record, as follows:

3 1. The deadline for the MPT Defendants to file their response to the
4 Complaint is extended from May 12, 2023 to June 9, 2023.

5 IT IS SO STIPULATED.

6 Dated: May 5, 2023

KTBS LAW LLP

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8 By: /s/ Samuel M. Kidder
9 Samuel M. Kidder (CA Bar No.
284015)

10 Attorneys for Defendants MPT of Los
11 Angeles, L.P., MPT of Olympia, LLC
12 MPT Operating Partnership, L.P., and
13 Medical Properties Trust, Inc.

14 Dated: May 5, 2023

UNITED STATES OF AMERICA

15
16 By: /s/ John R. Kresse
17 John R. Kresse
18 Trial Attorney
19 United States Department of Justice

20 Attorneys for United States of
21 America
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ATTESTATION

Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 5, 2023

KTBS LAW LLP

By: /s/ Samuel M. Kidder
Samuel M. Kidder (CA Bar No.
284015)

Attorneys for Defendants MPT of Los
Angeles, L.P., MPT of Olympia, LLC
MPT Operating Partnership, L.P., and
Medical Properties Trust, Inc.